

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	
)	
_____)	

**UNDERTAKING ACKNOWLEDGING AND AGREEING
TO BE BOUND BY SPECIAL MASTER CONFIDENTIALITY ORDER**

1. I have read the Special Master Confidentiality Order issued in the above-captioned action.

2. I am a person whom the Special Master has determined may possess Confidential Information and/or Highly Confidential Information.

3. I understand and acknowledge the terms of the Special Master Confidentiality Order and agree to be bound by them.

4. I agree not to disclose, summarize, describe, characterize, or otherwise communicate or make available, in whole or in part, any Confidential Information, Highly Confidential Information, or Confidential Information Filings (each as defined in the Special Master Confidentiality Order), except (if permitted) to such persons expressly referenced in Paragraph 4 of the Special Master Confidentiality Order, and who also have executed the required undertaking, if required.

5. I agree not to use Confidential Information, Highly Confidential Information, or Confidential Information Filings for any purpose other than those expressly referenced in

Paragraph 5 of the Special Master Confidentiality Order. I further agree not to disclose, summarize, describe, characterize, or otherwise communicate or make available, in whole or in part, Confidential Information, Highly Confidential Information, or Confidential Information Filings, except (if permitted) in documents filed confidentially with the Court pursuant to the Special Master Confidentiality Order.

6. I further agree to abide by the restrictions placed on information designated “Highly Confidential Pursuant to Order of the United States District Court for the District of Delaware, *Crystallex Int’l Corp. v. Bolivarian Republic of Venezuela*,” as set forth in the Special Master Confidentiality Order.

7. I agree that, in the event of a violation of the Special Master Confidentiality Order, I shall be subject to such sanctions and penalties as the Court deems just and proper.

8. I agree that the Special Master Confidentiality Order is valid and enforceable against me, and I waive any argument to the contrary.

9. I agree to personal jurisdiction in the United States District Court for the District of Delaware for all matters relating to the above-captioned action, including, but not limited to, all matters relating in any way to the Special Master Confidentiality Order, any Confidential Information, Highly Confidential Information, and/or any Confidential Information Filings.

10. I hereby submit to the exclusive and continuing jurisdiction of the United States District Court for the District of Delaware for all matters relating in any way to the Special Master Confidentiality Order, any Confidential Information, Highly Confidential Information, and/or any Confidential Information Filings.

11. I agree to file this Undertaking Acknowledging and Agreeing to Be Bound by Special Master Confidentiality Order with the Court in the above-captioned action.

Date: July 15, 2021

Signature: /s/ Ray C. Schrock, P.C.

Name: Ray C. Schrock, P.C.

Affiliation: Weil, Gotshal & Manges LLP

Title: Partner

Date: July 15, 2021

Signature: /s/ Michael J. Aiello

Name: Michael J. Aiello

Affiliation: Weil, Gotshal & Manges LLP

Title: Partner

Date: July 15, 2021

Signature: /s/ Jonathan D. Polkes

Name: Jonathan D. Polkes

Affiliation: Weil, Gotshal & Manges LLP

Title: Partner

Date: July 15, 2021

Signature: /s/ Alexander W. Welch

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Affiliation: Weil, Gotshal & Manges LLP

Title: Partner

Date: July 15, 2021

Signature: /s/ Stacy Nettleton

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Affiliation: Weil, Gotshal & Manges LLP

Title: Partner

Date: July 15, 2021

Signature: /s/ Renee M. Pristas

Name: Renee M. Pristas

Affiliation: Weil, Gotshal & Manges LLP

Title: Counsel

Date: July 15, 2021

Signature: /s/ Jason Hufendick

Name: Jason Hufendick

Affiliation: Weil, Gotshal & Manges LLP

Title: Associate

Date: July 15, 2021

Signature: /s/ Leslie Liberman

Name: Leslie Liberman

Affiliation: Weil, Gotshal & Manges LLP

Title: Associate

Date: July 15, 2021

Signature: /s/ Jake Schmidt

Name: Jake Schmidt

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Title: Associate

Date: July 15, 2021

Signature: /s/ Nicole E. Prunetti

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Title: Associate

Date: July 15, 2021

Signature: /s/ Ripley Shiarella

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Title: Associate

Date: July 15, 2021

Signature: /s/ Olivia Walseth

Name: Olivia Walseth

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Title: Associate

Date: July 15, 2021

Signature: /s/ Milana Bretgoltz

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Title: Associate

Date: July 15, 2021

Signature: /s/ Brigit Crosbie

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Title: Law Clerk

Date: July 15, 2021

Signature: /s/ Jake Altman-DeSole

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Title: Law Clerk

Date: July 15, 2021

Signature: /s/ Stephen Goldstein

Name: Stephen Goldstein

Affiliation: Evercore Group L.L.C.

Title: Senior Managing Director

Date: July 15, 2021

Signature: /s/ David Ying

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Title: Senior Managing Director

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Signature: /s/ Ray Strong

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Date: July 15, 2021

Signature: /s/ William Hiltz

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Title: Senior Managing Director

Date: July 15, 2021

Signature: /s/ Patrick O'Shea

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Title: Managing Director

Date: July 15, 2021

Signature: /s/ Kevin Putnam

Name: Kevin Putman

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Title: Vice President

Date: July 15, 2021

Signature: /s/ Michael Winterholler

Name: Michael Winterholler

Affiliation: Evercore Group L.L.C.

Title: Associate

Date: July 15, 2021

Signature: /s/ Annabelle Kim

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Affiliation: Evercore Group L.L.C.

Title: Analyst

Date: July 15, 2021

Signature: /s/ Jishnu Shah

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Title: Analyst

Date: July 15, 2021

Signature: /s/ Andrew Yeh

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Title: Managing Director

Date: July 15, 2021

Signature: /s/ Daniel Lakhdar

Name: Daniel Lakhdar

Affiliation: Evercore Group L.L.C.

Title: Vice President

Date: July 15, 2021

Signature: /s/ *Jim Li*

Name: Jim Li

Affiliation: Evercore Group L.L.C.

Title: Associate

Date: July 15, 2021

Signature: /s/ Ryan Douglas

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Title: Analyst

Date: July 15, 2021

Signature: /s/ Malavika Patel

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Signature: /s/ Myron T. Steele

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Title: Counsel

Date: July 15, 2021

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Title: Associate

Date: July 15, 2021

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Title: Partner

Date: July 15, 2021

Signature: /s/ Lee S. Wolosky

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Affiliation: Jenner & Block LLP

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Date: July 15, 2021

Signature: /s/ Ariana J. Kanavy

Name: Ariana J. Kanavy

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